

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DORMAN ANGEL, et al.

Plaintiffs

vs.

**UNITED PAPERWORKERS
INTERNATIONAL UNION (PACE)
LOCAL 1967, et al.**

Defendants

: CIVIL ACTION NO. **C-1-01-467**
:
: JUDGE: **SANDRA S. BECKWITH**
:
:
: **NOTICE TO TAKE DEPOSITION**
: **OF KEN STANIFER**
:
:
:
:

Please take notice that pursuant to Ohio Rules of Civil Procedure 30 and 32, Plaintiff by and through counsel will take the deposition of Ken Stanifer for all purposes permitted under the Ohio Rules of Civil Procedure and Evidence. Said deposition will take place on the 22nd day of November, 2004 at 9:00 a.m. at the offices of Jacobs, Kleinman, Seibel & McNally, 2300 Kroger Building, 1014 Vine Street, Cincinnati, Ohio, 45202. You are invited to attend and participate.

RESPECTFULLY SUBMITTED,

/s/ Mark J. Byrne

MARK J. BYRNE - #0029243

JACOBS, KLEINMAN, SEIBEL & MCNALLY

Trial Attorneys for Plaintiffs

2300 Kroger Building

1014 Vine Street

Cincinnati, OH 45202

Tele: (513) 381-6600

Fax: (513) 381-4150

E-mail: mbyrne@jksmlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Michael A. Roberts, Esquire
Graydon, Head & Ritchey
Attorney for Defendant
International Paper Company
1900 Fifth Third Center
511 Walnut Street
Cincinnati, OH 45202
mroberts@graydon.com

Vincent J. Miraglia, Esquire
International Paper Company
Legal Department
6400 Poplar Avenue
Memphis, TN 38197
vincent.miraglia@ipaper.com

W. Carter Younger, Esquire
McGuire Woods LLP
Attorney for Defendant
International Paper Company
One James Center
901 E. Cary Street
Richmond, VA 23219
cyounger@mcguirewoods.com

James B. Robinson, Esquire
Kircher, Robinson & Welch
Attorney for Defendant
PACE International Union
2520 Kroger Building
1014 Vine Street
Cincinnati, OH 45202
kircher@fuse.net

Robert J. Hollingsworth, Esquire
Cors & Bassett
Attorney for Defendant Smart Papers, LLC
537 E. Pete Rose Way, Suite 400
Cincinnati, OH 45202
rjh@corsbassett.com

Stanley F. Lechner, Esquire
Laine S. Posel, Esquire
Morgan, Lewis & Bockius
Attorney for Defendant
Smart Papers, LLC
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
slechner@morganlewis.com
lposel@morganlewis.com

Robert I. Doggett, Esquire
Attorney for Defendant
PACE Local 5-1967
6740 Clough Pike, Room 200
Cincinnati, OH 45244
rdoggett@sprynet.com

Grant S. Cowan, Esquire
Frost Brown Todd
Attorney for Defendant
International Paper Company
2200 PNC Center
201 E. Fifth Street
Cincinnati, OH 45202
gcowan@fbtlaw.com

I also certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

Ronald Morgan, Esquire
Morgan & Associates
118 South Second Street
Hamilton, OH 45011

4

/s/ Mark J. Byrne

MARK J. BYRNE - #0029243

Attorney for Plaintiffs